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Re: Request to require all black bear hunters to complete a bear identification course

Dear Director Nesvik, Chief King, and WGFD Commissioners:

In light of continued killings of grizzly bears by black bear hunters claiming mistaken identity, we are writing to ask that the Wyoming Game and Fish Department (WGFD) revise black bear hunting regulations to **require** all black bear hunters to complete the

WGFD bear identification course that is already in place and available from the Department. The killing of a large male grizzly bear west of Cody in the North Fork area on May 1, 2023 is only the latest example of one more grizzly bear that could be alive if black bear hunters were required to undergo training to properly identify the species of a bear. It is a hunter's responsibility to know their target and only pull the trigger when they are absolutely certain of the species at which they are aiming. Ethical hunting practices require basic wildlife identification skills to avoid illegal killing of non-target species, and most especially, protected species. Requiring an identification course for hunting black bears would help sharpen hunters' skills and could lead to fewer grizzlies being killed inadvertently by mistaken identity. This is a common-sense solution to a preventable problem.

From 2010 to 2022, the Interagency Grizzly Bear Study Team identified 14 grizzly bears in the Greater Yellowstone region that were killed because of mistaken identity, but a total of 113 mortalities remain "under investigation." Of those 14, the state of Wyoming had at least 3 grizzly bear mortalities because of mistaken identity. Over that 12-year period, there were a total of 113 mortalities in the database that remain "under investigation." Seventy-one percent of those mortalities under investigation were in Wyoming. Without knowing how many of those are mistaken identity, the incidence of grizzly bears being killed by black bear hunters is likely higher.

The state of Montana requires hunters to successfully complete a bear identification course along with a grade of 80% or higher (12 correct answers out of 15 multiple choice questions) on a test before they can obtain a black bear hunting license. Their course includes detailed descriptions and photographs that teach students how to distinguish black bears from grizzlies. Course materials also state, "As with all other aspects of hunting, it's the responsibility of the hunter to be sure of the species before pulling the trigger; claims of self-defense are exhaustively investigated. Remember, a mistaken identification may impact not only the conservation status of bears, but may also result in more restrictive hunting regulations. Your ability to tell the species apart and to make sure that a black bear doesn't have young will directly influence the future of bear hunting and the public image of hunting in Montana. The decision to act responsibly is up to you!" A similar program including a mandatory bear identification test should be implemented in Wyoming.

We appreciate the efforts already undertaken by the WGFD to educate black bear hunters on the characteristic differences between black and grizzly bears. There exists a good starting point for required regulations on the [Wildlife ID](#) section of the WGFD website. It would appear that discussions on making the course mandatory have already been a part of the creation of the existing materials. The web page states, "The test is currently voluntary and is being provided as an educational tool for black bear hunters. The Game and Fish Department is, however, interested in whether visitors to the site think it should remain voluntary or be mandatory." From this statement, we infer that the WGFD is open to making the test mandatory. The site goes on to say, "If you have questions, need additional information or have an opinion about whether the test should remain voluntary or become

mandatory, Please contact: Phone 307-777-4600, Wyoming Game and Fish Department, 5400 Bishop Blvd., Cheyenne, WY 82006.” Now is the time to make a bear identification course mandatory, before another federally-protected grizzly bear is killed and additional resources are expended by the WGFD for investigations and enforcement actions.

Grizzly bears are listed as threatened by the Endangered Species Act. Requiring a training course and test can help limit mortalities of grizzlies which will assist in their recovery. We thank you for your consideration of this request. If we can ever be of assistance, please know we are standing at the ready to help in any way. Please don't hesitate to contact us.

Sincerely,

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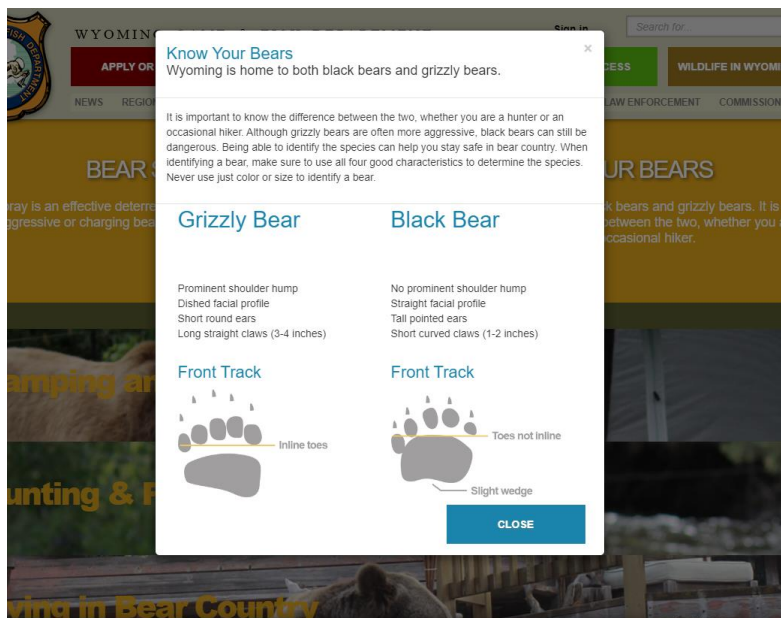
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Additional Feedback on WGFD Bear Identification Materials Listed on the WGFD Website

The WGFD provides a [quiz on the website](#) that people can use to test their bear identification skills, and a link to this quiz is included in the annual [black bear hunting brochure](#), stating, “BEAR SPECIES IDENTIFICATION COURSE. Black bear hunters are urged to test their bear observation and identification skills on the Department website ([wgfd.wyo.gov](#)). This educational ID course is intended to reduce grizzly bear mortalities caused by mistaken identity.” However, there is no guidance as to what percentage a person should achieve on the test before being considered qualified to discern the difference between grizzly bears and black bears. Black bear hunters must be able to consistently discern the difference between black bears and grizzly bears before being granted a license.

The WGFD [Bear Wise website](#) further includes a “Know Your Bears” fact sheet that lists physical differences between grizzly bears and black bears and shows the difference in tracks, but it does not offer any photographic examples of the differences between the species.



The WGFD’s [Wildlife ID](#) web page encourages visitors to visit [www.bebearaware.org](#) and “review the information under the Be Bear Aware Index.” However, when navigating to the Be Bear Aware website, there is not a clear “Be Bear Aware Index.” A [“Bears of North America”](#) link does provide general information on differences between North American bears, and the information given there is good, but it is a lot to read and doesn’t highlight differences between black bears and grizzly bears in a clearly labeled side-by-side comparison.